

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

IN RE: GOOGLE DIGITAL ADVERTISING  
ANTITRUST LITIGATION

This Document Relates to:

*AIM Media Ind. Operating, LLC v. Google, LLC*,  
No. 1:21-cv-06912-PKC (S.D.N.Y.)

*AIM Media Midwest Operating, LLC v. Google, LLC*, No. 1:21-cv-06884-PKC (S.D.N.Y.)

*AIM Media Tex. Operating, LLC v. Google, LLC*,  
No. 1:21-cv-06888-PKC (S.D.N.Y.)

*Appen Media Group, Inc. v. Google, LLC, et al.*,  
Case No. 1:22-cv-9810-PKC (S.D.N.Y.)

*Brown Cnty. Publ'g Co., Inc. v. Google, LLC*, No.  
1:21-cv-06915-PKC (S.D.N.Y.)

*Capital Region Indep. Media LLC v. Google LLC*,  
No. 1:22-cv-06997-PKC (S.D.N.Y.)

*Clarksburg Publ'g Co., d/b/a WV News v. Google, LLC*, No. 1:21-cv-06840-PKC (S.D.N.Y.)

*Coastal Point LLC v. Google, LLC*, No. 1:21- cv-  
06824-PKC (S.D.N.Y.)

*Eagle Printing Co. v. Google, LLC*, No. 1:21- cv-  
06881-PKC (S.D.N.Y.)

*ECENT Corp. v. Google, LLC*, No. 1:21-cv- 06817-  
PKC (S.D.N.Y.)

*Emmerich Newspapers, Inc. v. Google, LLC*, No.  
1:21-cv-06794-PKC (S.D.N.Y.)

*Flag Publ'ns, Inc. v. Google, LLC*, No. 1:21-cv-  
06871-PKC (S.D.N.Y.)

*Gale Force Media, LLC v. Google, LLC*, No. 1:21-  
cv-06909-PKC (S.D.N.Y.)

*Gould Enters., Inc. v. Google, LLC*, No. 1:22-cv-  
01705-PKC (S.D.N.Y.)

*HD Media Co., LLC v. Google, LLC*, No. 1:21-cv-  
06796-PKC (S.D.N.Y.)

*Journal Inc. v. Google, LLC*, No. 1:21-cv-06828-  
PKC (S.D.N.Y.)

Case No. 1:21-md-03010 (PKC)

*Neighborhood Newspapers, Inc. v. Google LLC*,  
No. 1:21-cv-10188-PKC (S.D.N.Y.)

*Robinson Commc'ns, Inc. v. Google, LLC*, No.  
1:21-cv-08032-PKC (S.D.N.Y.)

*Rome News Media, LLC v. Google LLC*, No. 1:21-  
cv-10186-PKC (S.D.N.Y.)

*Savannah Publ'g Co. v. Google, LLC*, No. 1:22- cv-  
01693-PKC (S.D.N.Y.)

*Something Extra Publ'g, Inc. v. Google, LLC*, No.  
1:21-cv-09523-PKC (S.D.N.Y.)

*Southern Cmty. Newspapers, Inc. v. Google, LLC*,  
No. 1:22-cv-01971-PKC (S.D.N.Y.)

*Times Journal, Inc. v. Google LLC*, No. 1:21-cv-  
10187-PKC (S.D.N.Y.)

*Union City Daily Messenger, Inc. v. Google, LLC*,  
No. 1:22-cv-01704-PKC (S.D.N.Y.)

*Weakley Cnty. Press, Inc. v. Google, LLC*, No. 1:22-  
cv-01701-PKC (S.D.N.Y.)

**META PLATFORMS, INC.'S NOTICE OF MOTION TO DISMISS COUNT II OF  
NEWSPAPERS' CONSOLIDATED AMENDED COMPLAINT**

CRAVATH, SWAINE & MOORE LLP  
Worldwide Plaza  
825 Eighth Avenue  
New York, NY 10019  
(212) 474-1000

*Attorneys for Meta Platforms, Inc.,*

February 3, 2023

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Defendant Meta Platforms, Inc.’s Motion to Dismiss Count II of Newspapers’ Consolidated Amended Complaint in the above-captioned matter, which is being submitted contemporaneously with this Notice of Motion, Meta Platforms, Inc. will move this Court, before the Honorable P. Kevin Castel, United States District Judge for the Southern District of New York, located at 500 Pearl Street, New York, NY 10007, at a date and time to be set by the Court, for an Order dismissing with prejudice Count II of the Newspapers’ Consolidated Amended Complaint (Dkt. No. 401), on the ground that the Newspapers have failed to state a claim upon which relief can be granted. *See* Fed. R. Civ. P. 12(b)(6); *Ashcroft v. Iqbal*, 556 U.S. 662 (2009); *Bell Atl. Corp. v. Twombly*, 550 U.S. 544 (2007).

Dated: February 3, 2023

CRAVATH, SWAINE & MOORE, LLP

by /s/ Kevin J. Orsini  
Kevin J. Orsini

Worldwide Plaza  
825 Eighth Avenue  
New York, NY  
(212) 474-1000  
korsini@cravath.com

*Attorneys for Meta Platforms, Inc.*